

## OHIO CIVIL RIGHTS COMMISSION

JENNIFER MAUDLIN

\*

CASE NO. 532 2013 00993

Charging Party,

v.

\*

INSIDE OUT

AFFIDAVIT OF WILLIAM STOUT

Respondent.

\*

STATE OF OHIO )  
 ) :SS  
 COUNTY OF \_\_\_\_\_ Cla \_\_\_\_\_ )

William Stout, being first duly sworn according to law, deposes and states as follows:

1. I am over the age of 18 years, am of sound mind, and have personal knowledge of the facts reflected in this affidavit.
2. I am the President of Inside Out, which is a Christian faith-based organization that I started in 1998 in order to share the gospel of Jesus Christ and serve underprivileged and at-risk youth in the Springfield, Ohio area. Currently, Inside Out operates a day care facility, a youth home, recreational facilities and a food service center that provides approximately 15,000 meals per month. Although Inside Out receives some funding from the Ohio Department of Agriculture, it is not government funded, but rather is considered to be a vendor/contractor with respect to this funding.
3. Inside Out is faith-based, and its efforts at helping underprivileged youth are modeled upon and derived from Christian principles. Since the children and youth that we serve are influenced by our conduct as much, if not more, than our words, Inside Out maintains standards of conduct for its employees that are based on Christian principles, ethics and morality. All employees, when hired, are introduced to the standards of conduct and informed of the expectations of the organization.
4. As a faith-based organization, Inside Out does not condone sexual relationships outside of marriage. Our work with underprivileged and at-risk youth continually encounters the consequences and hardships produced by teen pregnancies, sexually transmitted diseases, lack of parenting and other fallout from non-marital sexual relationships. Inside Out believes that its credibility would be materially compromised if it permitted employees to engage in the type of relationships that it teaches the at-risk youth that it serves to avoid.
5. Inside Out also believes that Christian principles dictate that those who breach conduct standards are to be approached with a combination of correction, compassion and restoration. With

regard to single, expectant female employees, each situation is handled on a case by case basis. If the employee is willing to participate in counseling and is amenable to future adherence to the conduct standards of Inside Out, their employment is not affected. In the past, Inside Out has dealt with single, pregnant female employees who have returned to work following maternity leave. Contrary to the allegations in the charging affidavit of Ms. Maudlin, Inside Out does not have a practice of terminating unmarried female employees upon discovery of a pregnancy, nor does it "target" married employees who are expecting a child.

6. The conduct standards of Inside Out are applicable to all employees, regardless of gender. Male employees who are determined to be involved with sexual relationships outside of marriage are handled in the same manner as single female workers who become pregnant.


7. I was not involved in any decisions involving the departure of Jennifer Maudlin from employment at Inside Out. In early September, 2012, I was informed by Cathy Ernst, Executive Director of Inside Out that Ms. Maudlin had resigned for personal reasons. Ms. Maudlin was never terminated from employment, nor was she subjected to any employment action on account of her gender or status as a single, female individual.

8. Inside Out does not inquire into the sexual behavior of any employees, male or female, unless a specific situation that may reflect negatively upon the operation of the organization is brought to the attention of management. In such an event, the situation is handled on a case by case basis, with the goal of restoration and continued employment of the individual.

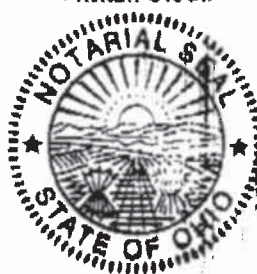
9. Inside Out has never hired, either directly or on a contract basis, an individual who was known to be a registered sex offender.

10. Employees of Inside Out who are suspected of using drugs or alcohol are handled on a case by case basis. Typically, employees who exhibit signs of drug or alcohol use are requested to submit to a drug test, and if the results are positive, they are invited to undergo counsel and agree to refrain from future drug or alcohol use. If they are successful in these endeavors, they remain employed by Inside Out.

And further affiant saith not.

  
William Stout

The foregoing instrument was acknowledged before me this 23 day of May, 2013, by William Stout.



Tyler T. Stroder  
Notary Public State of Ohio  
Clark County  
My Commission Expires  
April 20th 2016

  
Notary Public

My Commission expires: April 20th 2016